

# Rankin & Taylor

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**VIA HAND DELIVERY ONLY**

May 29, 2009

Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 920  
New York, NY 10007

**MEMO ENDORSED**

The Application is granted.

**SO ORDERED:**

*Paul A. Randolph*  
Paul G. Gardephe, U.S.D.J.

Dated: *June 1, 2009*

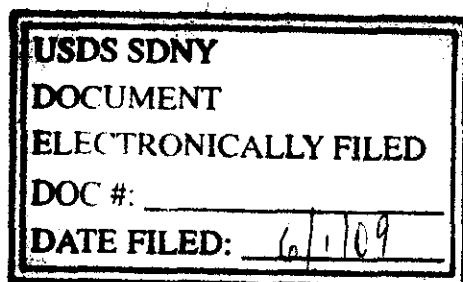
**RE: Lin, Joyce, et. al. v. City of New York, et. al.**  
**09 Civ. 1936 (PGG)**

Dear Honorable Paul G. Gardephe:

I write to request an extension of time to produce PL § 160.50 releases in the above referenced case. On May 21, 2009, Corporation Counsel, Elizabeth W. Dollin, wrote requesting an extension of time to file an answer and to delay the preliminary conference. Your Honor endorsed this request the same day and ordered Plaintiffs to produce PL § 160.50 releases by today, May 29, 2009. Plaintiffs' request a two week extension of time to provide the remaining releases, making the deadline June 12, 2009. This is the first request for this relief. I placed a call to Ms. Dollin and her message machine indicated that she is out of the office today.

Releases have been provided for Jordan Groh, Christian Gutierrez, and Richard Vazquez. It is Plaintiffs' position that because Caroline Sampanaro was never formally arrested (detained only) a PL § 160.50 is unnecessary. This leaves only Joyce Lin. Ms. Lin is working in forestry in Colorado. She has only sporadic internet and phone communication access. As such, it is taking a little longer than we anticipated getting her release to Corporation Counsel. Ms. Lin had a prior medical condition that was exacerbated by the New York City Police Department, and therefore we will be providing a HIPPA release for her. The remainder of the plaintiffs did not seek medical care, so HIPPA authorizations are unnecessary. However, a HIPPA release from Jordan Groh was also provided.

I thank you for your continued consideration in this matter.



Very best regards,

*David B. Rankin*  
David B. Rankin